

RHEINGOLD GIUFFRA RUFFO & PLOTKIN LLP

551 FIFTH AVENUE, 29TH FLOOR

NEW YORK, NEW YORK 10176

Tel: (212) 684-1880

Fax: (212) 689-8156

www.rheingoldlaw.com

DAVID B. RHEINGOLD◇

THOMAS P. GIUFFRA◆

EDWARD A. RUFFO◆

SHERRI L. PLOTKIN◆

JEREMY A. HELLMAN◆

KELLY MULHOLLAND

Of Counsel

PAUL D.

RHEINGOLD‡●

Also Admitted In:

D.C. ‡

Virginia ◇

New Jersey ◆

Massachusetts ●

January 5, 2024

Honorable Rukhsanah L. Singh, U.S. Magistrate Judge
United States District Court-District of NJ
Clarkson S. Fisher Building & U.S. Courthouse
& U.S. Courthouse
402 East State Street, Court Room 7W
Trenton, NJ 08608

***In Re: Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices,
and Products Liability Litigation – MDL 2738***

This document relates to:

Phyllis Arnoff - 3:16-cv-09228

Miriam Schnier - 3:17-cv-12279

Dear Magistrate Judge Singh:

In reference to the December 14, 2023, letter from defendants (Document 28797) and the Court's Text Order (28820), this is to advise the court that the above clients' Plaintiff Profile Forms have been filed. In addition, our firm has filed all related documents such as the HIPPA, Declaration, and Medical Records.

Phyllis Arnoff's Plaintiff Profile Form has been filed on November 20, 2023. It was necessary to deal closely with various family members, as the required discovery responses needed to come from various sources. Therefore, the family members needed time to collect the pertinent information to satisfy the Court Order.

Miriam Schnier's Plaintiff Profile Form has been filed on December 16, 2023. Mrs. Schnier has been in and out of hospitals recently, which made her unavailable to complete the discovery request. Even when she was not in the hospital her health condition made it difficult for her to complete the discovery. However, as soon as she was healthy enough to do so, she completed all outstanding discovery matters. She personally discussed her health situation with me and informed me that she was physically not well enough to complete the discovery demands.

As we always do, we advise our clients and family members on the importance of discovery deadlines. These clients understand the importance of the process and will be cooperating and adhering to pertinent deadlines in the future. Our firm believes that all issues regarding the Defendants' letter have been addressed. Counsel for Plaintiffs will be available on the January 10th call to answer any matters the Court may have.

Very truly yours,

/s/ David B. Rheingold
Rheingold Giuffra Ruffo & Plotkin
SC Attorney ID: 104423
551 5th Avenue, 29th Floor.
New York, New York 10176
P: (212) 684- 1880
F: (212) 689- 8156
Email: rheingold@rheingoldlaw.com
Attorney for Plaintiff

cc: All Counsel of Record (via ECF)

CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2023, I electronically filed the foregoing document.
with the Clerk of the Court using the CM/ECF system which will send notification of such filing
to the CM/ECF participants registered to receive services in this MDL.

BY: */s/ David B. Rheingold*
Rheingold Giuffra Ruffo & Plotkin
SC Attorney ID: 104423
551 5th Avenue, 29th Floor.
New York, New York 10176
P: (212) 684- 1880
F: (212) 689- 8156
Email: rheingold@rheingoldlaw.com
Attorney for Plaintiff